

81. The Painting was never returned to Amalie Redlich or her heirs, nor did they receive compensation for its loss.

82. As Amalie Redlich's sole heir, Plaintiff is the rightful owner and is thus entitled to recover sole possession of the Painting.

83. The Painting is a unique and irreplaceable work of art.

84. Plaintiff has demanded the return of the Painting, which demand has been refused by Defendant.

85. As a result, Defendant has damaged Plaintiff in an amount to be determined at trial. Plaintiff seeks the return of the Painting.

COUNT II **CONVERSION**

86. Jorisch repeats and realleges each allegation set forth in paragraphs 1 through 85 as if fully set forth herein.

87. Plaintiff is the rightful owner, and is thus entitled to recover sole possession of the Painting.

88. Defendant converted and appropriated the Painting to his own personal use in complete disregard and derogation of Plaintiff's rights, title and interest in and to the Painting.

89. As a result of Defendant's wrongful conduct, Plaintiff has suffered damages in an amount to be determined at trial.

COUNT III
QUIET TITLE

90. Jorisch repeats and realleges each allegation set forth in paragraphs 1 through 89 as if fully set forth herein.

91. The Painting was unlawfully taken by the Nazis and never returned to their rightful owners.

92. Defendant does not have good title to the Painting.

93. Plaintiff has made a demand for return of the Painting.

94. Defendant has unlawfully refused to return the Painting.

95. Plaintiff is entitled to a judgment that he has title to the Painting and that Defendant does not have such title.

COUNT IV
DECLARATORY RELIEF

96. Jorisch repeats and realleges each allegation set forth in paragraphs 1 through 95 as if fully set forth herein.

97. The Painting was unlawfully taken by the Nazis and never returned to its rightful owner.

98. Defendant does not have good title to the Painting.

99. Plaintiff has demanded the return of the Painting.

100. Defendant has unlawfully refused to return the Painting.

101. Plaintiff is entitled to a judgment declaring that he is the rightful owner of the Painting and that Defendant has no right, title and interest in and to the Painting.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that the Court enter a judgment as follows:

- a) For an order restraining Defendant, his officers, directors, agents, servants, employees and attorneys and persons acting in concert with him or pursuant to his instructions, from selling, transferring, pledging, dispersing or otherwise disposing of the Painting, *Blooming Meadow (1904/05) (W176)*, during the pendency of this action;
- (b) For a declaration that Plaintiff is the rightful owner, and entitled to immediate possession of, the Painting, *Blooming Meadow (1904/05) (W176)*;
- (c) For an order quieting title in the Painting, *Blooming Meadow (1904/05) (W176)*, in Plaintiff and against Defendant;
- (d) For an order directing that Defendant immediately deliver the Painting, *Blooming Meadow (1904/05) (W176)*, to Plaintiff;
- (e) For an order awarding to Plaintiff damages in an amount to be determined at trial, but which is reasonably believed to be \$10-20 million;
- (f) For an award to Plaintiff for the costs and disbursements of this action; and
- (g) For such other and further relief as this Court deems just and proper.


JURY DEMAND

Plaintiff GEORGES JORISCH demands trial by jury of all counts and claims triable to a jury.

Dated: October __, 2007
New York, NY

Respectfully submitted,

HELLER EHRMAN LLP

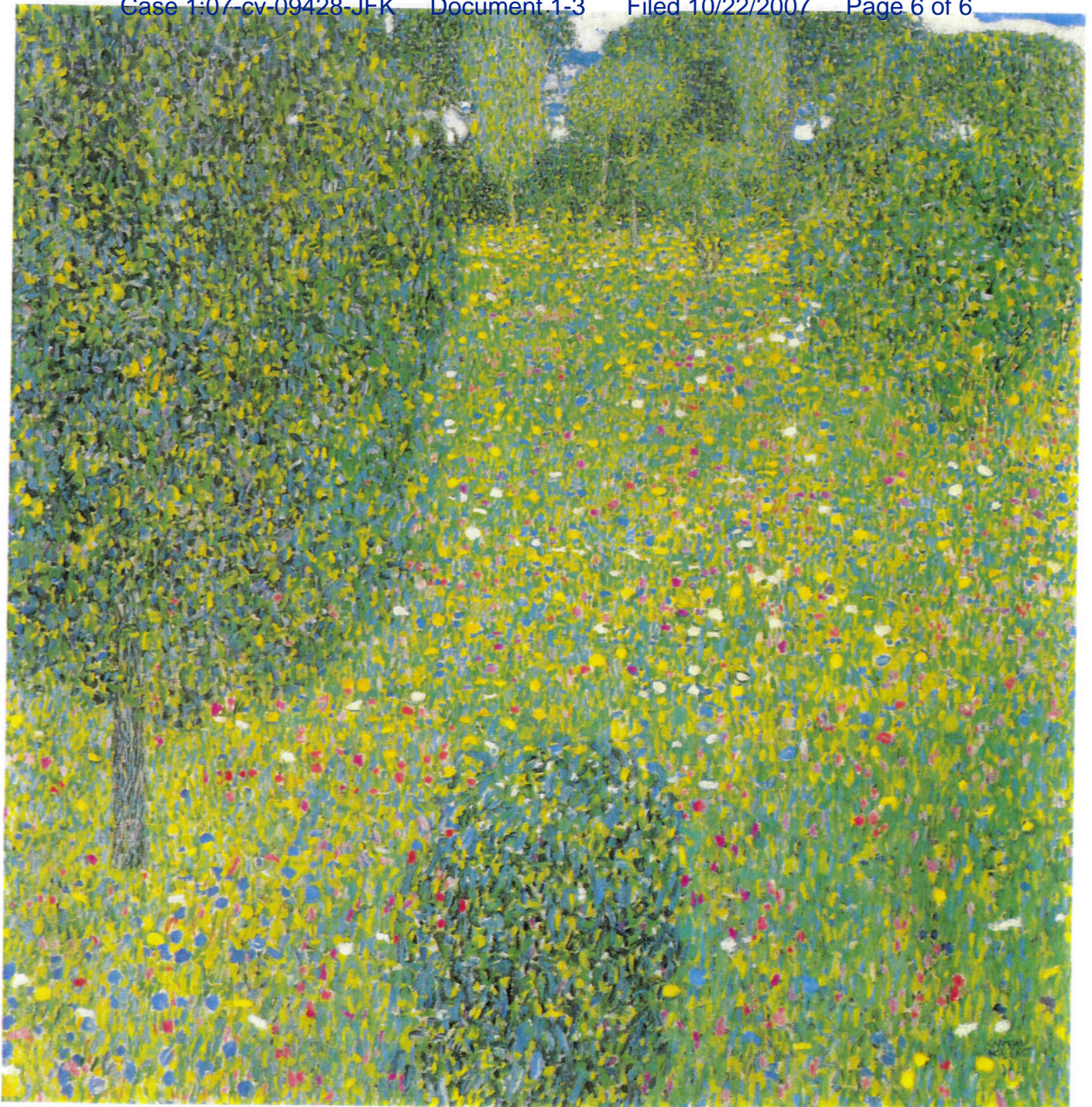
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EXHIBIT A



27 Gartenlandschaft (Blühende Wiese), um 1905/06
Privatsammlung